

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**JEREMY DOMINICK,**

**Plaintiff,**

**v.**

**SYSCO ATLANTA, LLC,**

**Defendant.**

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

**NO. 1:19-CV-01645-MLB-LTW**

**JOINT MOTION TO DISMISS WITH PREJUDICE**

Plaintiff Jeremy Dominick (“Dominick” or “Plaintiff”) and Defendant Sysco Atlanta, LLC (“Sysco” or “Defendant”) file this Joint Motion to Dismiss with Prejudice.

All matters and things in controversy herein between Plaintiff and Defendant have been resolved. As part of the resolution, the parties request that the Court dismiss Plaintiff’s claims against Defendant with prejudice to the re-filing of same.

As evidenced by the signatures of the attorneys on this Motion, this Motion is agreed upon by the parties. A proposed Order is attached.

**CERTIFICATE OF COMPLIANCE WITH  
LOCAL RULES 7.1D AND 5.1C**

Pursuant to Local Rules 7.1D and 5.1C, the undersigned counsel hereby certifies that the foregoing document complies with the requirements as to font and has been prepared in Times New Roman, 14 point.

/s/ James Radford

James Radford  
Georgia Bar No. 108007  
Radford & Keebaugh, LLC  
315 W. Ponce de Leon Ave.  
Suite 1080  
Decatur, Georgia 30030  
(678) 271-0302  
james@decaturlegal.com

**Counsel for Plaintiff**

/s/ Peter J. Stuhldreher

Peter J. Stuhldreher\*  
Texas Bar No. 24056393  
Reed Smith LLP  
811 Main Street, Suite 1700  
Houston, Texas 77002  
Telephone: (713) 469-3800  
Facsimile: (713) 469-3899  
pstuhldreher@reedsmith.com

s/ David R. Anderson

Patrick L. Ryan  
Georgia Bar No. 269833  
pryan@fordharrison.com  
David R. Anderson  
Georgia Bar No. 368564  
danderson@fordharrison.com  
Ford & Harrison LLP  
271 17<sup>th</sup> Street, N.W., Suite 1900  
Atlanta, GA 30363  
Phone: (404) 888-3800  
Facsimile: (404) 832-8728

**Counsel for Defendant**

\*Admitted *Pro Hac Vice*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**JEREMY DOMINICK,**

**Plaintiff,**

**v.**

**SYSCO ATLANTA, LLC,**

**Defendant.**

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

**NO. 1:19-CV-01645-MLB-LTW**

**CERTIFICATE OF SERVICE**

I hereby certify that, on August 19, 2019, a true and correct copy of the foregoing document was served on the following counsel of record via the Court's CM/ECF system:

James Radford  
Radford & Keebaugh, LLC  
315 W. Ponce de Leon Ave., Suite 1080  
Decatur, Georgia 30030

/s/ David R. Anderson

David Anderson